

South Lake Union Height and Density Environmental Impact Statement (EIS) Summary of Scoping Comments

On November 16, 2008 DPD issued a Determination of Significance and Notice of Scoping for 3 proposed alternatives for increasing height and density in the South Lake Union neighborhood. Issues raised in comments include specific environmental impacts proposed for study in the EIS, the alternatives proposed for study, and the planning process that has led to development of the proposed alternatives. DPD has carefully reviewed these comments and has revised the alternatives and the elements of the environment to be studied in the EIS.

In the time since the comment period closed(December 18, 2008), the City has worked closely with neighborhood stakeholders to develop a Design Framework for the neighborhood. This Design Framework was developed in direct response to the concerns raised by stakeholders in their scoping comments and is intended to complement and inform the EIS alternatives, provide direction on potential impact mitigation, as well as serve as a tool to guide implementation of the neighborhood plan. The revised EIS alternatives are informed by both scoping comments and ideas generated through the Urban Design Framework process.

The issue summary below identifies how revisions to the EIS alternatives respond to scoping comments. Issues related to building height, tower spacing, podium height, view impacts, design standards, public amenities and housing are all addressed in the EIS alternatives. As the EIS analysis progresses, impacts may be identified which may further refine how each of these issues is addressed in any recommendation to increase height and density in the neighborhood.

Below is a summary of issues and a discussion of how the revised alternatives respond to them.

Summary of Scoping Comments.

Growth Targets

A frequently raised issue in the scoping comments was the relationship of the EIS alternatives to Comprehensive Plan growth targets for the neighborhood --Why increase height and density in the neighborhood since the existing zoning provides adequate zoning capacity to meet the growth targets for the period 2004-2024?

The growth target established in the Comprehensive Plan is not statement of optimal neighborhood density, but rather a planning tool to determine the level of services and infrastructure that will be necessary within a reasonably foreseeable future. The City's six urban centers are the backbone of the City's long-term growth management strategy. The Comprehensive Plan directs 58% of all future residential growth and 73% of all future employment growth to the City's urban centers. In 2004, when the City designated South Lake Union an urban center, it established a 20-year growth target of 16,000 jobs and 8,000 dwelling units. Designation of the neighborhood as an urban center and establishing growth targets helps the City make decisions about the allocation of resources in ways that support the anticipated housing and jobs commensurate with the established growth targets. New 20-year growth targets will be established in 2011 and every 7 years thereafter.

Although the goal of evaluating height and density in the South Lake Union neighborhood is not strictly to ensure adequate development capacity to meet neighborhood growth targets, it is important that there be excess development capacity to accommodate growth into the future – beyond the horizon of existing growth targets. The Seattle Municipal Code requires that zoned development capacity in an Urban Center be at least 125% of the twenty-year growth target. Current zoning provides enough development capacity to meet the 2024 growth targets and satisfy the 125% requirement. Existing development capacity for housing is approximately 10,000 dwelling units – 125% of the existing 8,000 dwelling unit growth target. Existing development capacity for jobs is 27,000 – approximately 168 % of the existing 16,000 growth target. However, as new growth targets are established, in South Lake Union and other Urban Centers, zoned development capacity will need to be monitored to ensure adequate capacity is available.

Podium Height

Comments on proposed podium height generally found the podiums in Alternative 1 and to a lesser degree Alternative 2 excessive. A common theme was that allowing additional overall structure height is only appropriate if the street level is opened up through street level open space and reduced podium heights.

Through the Design Framework process, a range of solutions to concerns over podium height were discussed, and this discussion informed revision of the EIS alternatives. In the revised alternatives, podium heights are generally lower (usually not greater than 45 feet) but are slightly higher (65 feet) along key streets that are wider and where greater massing at the street helps to frame “an urban room” that supports street-level retail and related activities. The EIS will include an analysis of the pedestrian experience including shade and shadow impacts which could result in additional revisions to podium heights in the final zoning recommendation for the neighborhood.

Range of Heights

Numerous comments were related to the range of building heights included in the proposed alternatives. The alternatives include building heights ranging from 400 feet to those height-limits that exist under current zoning (65 feet to 125 feet). The revised alternatives have created a greater distinction between Alternatives 1 and 2, provide a greater range of heights to be studied at the lakefront, and when combined with revisions to podium height discussed above, are responsive to many comments that suggested that increased height was only acceptable with lower podiums. The greatest reduction in heights was in Alternative 2 where lower heights for commercial uses in the central portion of the neighborhood and at the lakefront are intended to support more of a step down approach. This reduction in heights for alternative 2 also allows for a distinct mid-range option to be studied in the EIS. In addition, a new FAR limit on commercial structures means that in many cases, commercial projects may be shorter than the maximum height permits, or the number of towers per block will decrease to take advantage of the additional height (see tower spacing discussion, below).

Tower Spacing

A frequently identified issue is the potential for concentration of towers in the neighborhood and the need for appropriate tower spacing requirements. Based on comments submitted during the scoping process, and discussions that occurred as part of the Urban Design Framework process, several revisions to EIS alternatives will result in greater tower spacing. New tower spacing provisions include:

- **Minimum Lot Size.** The minimum lot size per tower was simplified to 22,000 square feet per tower, or a maximum of two towers per block throughout the neighborhood. At the lakefront, a new provision limits the minimum lot size to 60,000 square feet per tower, or a maximum of 1 tower per block.
- **Floor Area Ratio.** The revised alternatives include a floor area ratio for commercial structures that would have the effect of limiting either the height or the number of towers per block. Allowing commercial towers to develop to a maximum FAR of 7 means that to develop a 24 story commercial office building with 24,000 square foot floor plates (the maximum permitted in all of the alternatives) would require a lot size of approximately one block. For smaller lot sizes, either the floor plate size or the tower height will need to be reduced.

As impacts are identified through the EIS process, it is possible additional tower spacing measures may be identified as mitigation.

View Impacts

The EIS will analyze potential view impacts. SEPA protected viewpoints and corridors will be the basis for this analysis. Through 3D modeling, the EIS will compare the urban form impacts of each alternative at build-out including SEPA protected public viewpoints and corridors. Note: It is not the City's policy to protect private view points. Specific development standards (setbacks, height limits etc...) may be used to mitigate potential view impacts.

In addition, through the Design Framework process a number of non-SEPA protected views were identified as important to the community. These views include views west to the Space Needle from John and Thomas Streets, views north to Lake Union and Gasworks Parks from Boren Avenue and views east to Lake Union from Dexter Avenue north of Valley Street. Because these are non-SEPA protected views, they may be addressed through the South Lake Union Neighborhood Design Guidelines rather than the Land Use Code.

Design Standards

Lack of design standards for taller buildings was identified as a concern. Such standards could include setbacks at the street level to provide for a better pedestrian environment, upper level setbacks to minimize shade/shadow at the street level, and open space requirements. The EIS will evaluate the experience of residents and users of the area at a pedestrian level including an analysis of shade and shadow impacts at the street level and on important public spaces such as Lake Union Park, Denny Park, and Cascade Park. As impacts are identified in the EIS, appropriate development standards for taller buildings will be developed as mitigation.

Through the Design Framework process, a number of important ideas about the design and siting of taller buildings were identified. Some of these ideas may provide mitigation to impacts identified in the EIS (development standards in the zoning code), and others, while not appropriate as development standards, will inform revision of the South Lake Union Design Guidelines.

Public Amenities

As more people live and work in South Lake Union the desire for public amenities necessary to support the neighborhood was identified as an issue. The EIS will study such needs as open space and recreation, public services and utilities, transportation infrastructure, and housing.

Other needs identified through scoping comments include the need for a school, a library, day care services, arts space, and a community center. Through the Design

Framework process, the community has established a prioritized set of public amenities to be financed, in part, through proposed additional height and density through an incentive zoning structure.

Housing

The need for affordable housing and for a diversity of housing types was identified as a key issue.

As part of the EIS analysis, the impacts on housing will be analyzed. The analysis will assess potential impacts on affordable housing under each alternative and will estimate the total number of affordable and market rate dwelling units that could be built under each alternative.

Through the Design Framework process, a range of ideas are proposed for creating incentives to encourage development of housing suitable for families, along with the particular amenities necessary to attract and sustain them in an urban neighborhood like South Lake Union. This discussion will continue as the EIS moves forward and ideas will be incorporated into future zoning recommendations.